COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Proceeding by the Department of Telecommunications and Energy on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Mass Market Customers	D.T.E. 03-60 – Track B

AT&T's THIRD SET OF INFORMATION REQUESTS TO VERIZON-MASSACHUSETTS

AT&T Communications of New England, Inc. ("AT&T") hereby submits to Verizon-

Massachusetts ("Verizon") the following information requests. AT&T requests responses in

accordance with the Procedural Order Memorandum and Ground Rules issued by the

Department in this docket on October 17, 2003 and November 24, 2003.

INSTRUCTIONS

1.   Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

2.   These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

3.   If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

4.   If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

5.   If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

6.   Unless otherwise stated, information requests refer to the state of Massachusetts.

INFORMATION REQUESTS

ATT-VZ-92 On page 6 of Verizon's December 17, 2003 Supplemental Initial Panel Testimony, Verizon states: "[i]n the case of loops using IDLC technology . . . the APC must find and assign alternative copper or UDLC facilities." Will orders that contain customers with lines on IDLC facilities fall-out for manual processing (i.e., each and every time, 100% fallout)? Will alternative facilities for these orders be assigned manually by the APC? If the answer to either of the preceding questions is no, please explain what process will be applied to IDLC loops.

ATT-VZ-93 On page 3 of the November 14, 2003 Testimony of William E. Taylor, Verizon states that its hot cut volumes are conservative because "some CLECs may, upon the elimination of UNE-P, migrate to non-UNE-L alternatives such as resale or (particularly in the case of cable companies) may choose to provide their own switching and loop facilities." Please provide:

(a) The number of UNE-P lines in Massachusetts that are currently being used by cable companies to provide retail service; and

(b) Any analysis that Verizon has performed that demonstrates that a current UNE-P provider can move its mass market customer's service to resale and be profitable.

ATT-VZ-94 Please explain and provide examples of CLEC LSR conditions which would cause the service ordering processor to detect and produce fallout for which Verizon Nonrecurring Cost Model ("VZ NRCM") NMC task #4 ("Create Order Manually, if Necessary") would need to be invoked. For each example provided please also produce a table indicating the percentages of occurrences for each. For each example, please also explain whether (and if so how) the CLEC could have prevented this fallout from occurring.

ATT-VZ-95 Please indicate if any conditions for which orders would be created manually by Verizon (as in NMC task #4) would cause any future LSRs to also fallout. In other words, are there conditions for which Verizon corrects the CLEC's LSR and creates the service order manually, and for which the CLEC is not notified about the error condition, which notification would have allowed the CLEC to avoid future fallout.

ATT-VZ-96 Please explain under what conditions Verizon will cancel the CLEC's LSR as expressed in VZ NRCM NMC task # 6.

ATT-VZ-97 In addition to the above question, please also explain why it would be necessary for the NMC to manually contact the CLEC with assignment problems (NMC task #5) after VZ NMC has manually created the order by task #4. Please also explain why it is also necessary to manually contact the APC (as expressed by task NWC task #5). Wouldn't the APC automatically be notified by the OSS when it is unable to assign facilities automatically (i.e., the OSS would deliver a RMA to the APC)?

ATT-VZ-98 In addition to the above question, please explain how the RCCC could analyze the order prior to its creation (RCCC task # 2) when the order hasn't been created yet (it falls out at the NMC automatically thus no auto creation)? In addition please explain how the CO FRAME could analyze the order when the order hasn't been created yet? Please explain and provide copies of the survey(s) which indicate that the RCCC would not use RCCC task #1 ("Negotiate Due Date And Fall Out Date's").

ATT-VZ-99 In Verizon's Exhibit-II-C "Verizon's Basic Hot-Cut Flow" the following assignment step is described "Order goes to the assignment step. If there appears to be an issue with the CLEC collo facility, it is referred back to the CLEC for correction or clarification. If IDLC is present, the APC selects an alternate facility if one is readily available."

(a) Assuming spare facilities exist within the inventory and are available at the SAI location, under what circumstances would Verizon's OSS not automatically assign to a CLEC's hot cut request containing IDLC facilities.

(b) Please provide the Assignment Control Parameters (ACP's) within Verizon's OSS for the state of Massachusetts. For each value which is set within the MA ACPs, please explain its purpose and rationale.   Please identify any differences that exist for processing CLEC requests in the assignment phases as opposed to a Verizon retail request and, for each such difference, explain they the difference is necessary or exists. If there are no such differences, please so state.

ATT-VZ-100 Please quantify any assumptions that were assumed with regard to using the existing ACP's (as they are now) or whether any modifications to existing ACP's were considered when subject mater experts calculated the current occurrence factor and or forward-looking adjustment factor.

ATT-VZ-101 Based upon Verizon's FLM analysis, what is the peak number of additional employees the company need to dedicate to the hot cut process if UNE-P is no longer available?

ATT-VZ-102 Please explain the basis for applying a different forward looking adjustment for CO FRAME task # 3 ["Prewire Line(s)] within the large job and batch hot cut cost studies.

ATT-VZ-103 On page 69 of Verizon's Initial Panel Testimony, Verizon states "incremental supervision requirements are accounted for by applying an associate/manager ratio to the incremental number of associates determined through the analysis described above." Please specify what the associate/manager ratio is that was used to arrive at the additional supervisory staff that will be needed.

ATT-VZ-104 On page 71 of Verizon's Initial Panel Testimony, Verizon states "essentially, a cluster is defined as any group of central offices located near enough to each other to permit the use a traveling work force." Please define what Verizon means by

"near enough". Please specify the maximum number of central offices that will be included in any given cluster. Please share what plans, if any, that Verizon has for equipping these offices with automated cross-connection capabilities that Verizon currently has in a number of its remote central offices.

ATT-VZ-105 Please clarify whether the additional staffing that Verizon will require per the output of its FLM tool are included in the results of Verizon's cost study filed in conjunction with this proceeding. If not, please specify when Verizon will re-file its cost model to reflect the cost of this additional staffing requirement.

ATT-VZ-106 Please refer to Verizon's Initial Panel Testimony, Exhibit III-A, page 2. Footnote (1) states: "Field installation cost is charged to the CLEC based on tariffed rates when necessary to complete the service order or when requested by the CLEC."

    (a)   Provide a description of the scenarios for which a field installation would be "necessary to complete the service order".

    (b)   Indicate what the field installation charge(s) would be for each scenario(s) described in (a) above and specifically where in Verizon's current tariffs such charge(s) can be found.

ATT-VZ-107 Referring to Verizon's Initial Panel Testimony, Exhibit III-A. For NMC task # 6, please provide documentation that supports the 50% typical occurrence factor for the cancellation or modification of due date for large job and batch hot cut orders. Please provide the number and percentage of large job hot cuts that required canceled or modified due dates for each month in 2003.

ATT-VZ-108 Referring to Verizon's Initial Panel Testimony, Exhibit III-A, please identify the work activities that are required by the CO frame technician to perform CO FRAME task # 5 ("Complete order") and CO FRAME task # 7 ("Perform throwback").

ATT-VZ-109 In Mr. Taylor's Initial Testimony at page 19, he states that "[t]he remaining 654 lines would have no effect on incremental hot cuts because they would migrate to facilities-based CLECs (406 = 0.4877 x 833) and resale-based CLECs (248 = 0.2976 x 833)."

    (a)   Explain in detail the process that would need to be implemented to migrate a customer's local service from Verizon retail to a facilities-based CLEC. Include the service order, coordination, number portability, wire disconnection, switch port disconnection, etc, processes that Verizon and the CLEC would need to implement to complete the migration.

    (b)   Indicate the charges to the CLEC, if any, that would apply to migrate a customer's local service from Verizon retail to a facilities-based CLEC. Include the service order, coordination, number portability, etc, charges to the CLEC that would apply in order to complete the migration.

ATT-VZ-110 On page 20 of Mr. Taylor's testimony, he states: "Noting that only about half the migrations that correspond to reverse hot cuts actually require hot cuts …"

(a)	Provide all studies, documents, information, work papers, etc, that were used to determine that only about half of reverse hot cuts "actually require hot cuts".

(b)	Explain in detail the process that would need to be implemented to migrate a local customer from a CLEC to Verizon for those reverse hot cuts that do not actually require a hot cut. Include the service order, coordination, number portability, wire disconnection, switch port disconnection, etc, processes that Verizon and the CLEC would need to implement to complete such a migration.

ATT-VZ-111	On page 74 of its Initial Panel Testimony, Verizon states: "Verizon has the ability to hire temporary workers for up to one year. Those workers can be terminated or converted to full-time employees at the end of the one-year period." How many temporary employees will be hired in year 1, in year 2 and in year 3?

ATT-VZ-112	On page 9 of its Initial Panel Testimony, Verizon states: "Although the process used for such "winbacks" is similar in many ways to the standard Verizon-to-CLEC hot cut process, it also differs from it in one very significant respect. Specifically, in a winback cutover, little or no coordination is required between Verizon and the CLEC." Explain in detail the tasks performed in the "coordination" that is required for a conversion from Verizon to a CLEC, that would not be required for a hot cut when it is a winback.

ATT-VZ-113	Please refer to Verizon's Initial Panel Testimony, Exhibit III-A. For the following hypothetical scenario in which a CLEC(s) issues a hot cut request(s) to Verizon. Show how the rates indicated in the above referenced exhibit, and any other applicable rates, would apply. Indicate separately for each scenario the total charge to the CLEC, each component rate that is summed to calculate the total charge and a reference to Exhibit III-A or any other source from which the rates were obtained.

For a Batch Hot Cut:

(a)	A hot cut project that includes 50 LSRs- 25 LSRs are issued by CLEC A, and 25 LSRs are issued by CLEC B. Each LSR has one line. Of the 50 LSRs, one line included in one of CLEC A's LSRs is on an IDLC facility and the other 49 lines are not on an IDLC facility.

(b)	A single batch hot cut project that includes 50 LSRs- 25 LSRs are issued by CLEC C, and 25 LSRs are issued by CLEC D. The 25 LSRs issued by CLEC C each have one line and the 25 LSRs issued by CLEC D each have two lines. None of the lines are on IDLC facilities.

ATT-VZ-114	On page 53 of its Initial Panel Testimony, Verizon states that field managers were polled to develop a typical occurrence factor. Please provide any documentation associated with this poll. Please additionally provide any studies, documents, information, work papers, data, etc. that Verizon cost analysts relied upon to verify the survey and poll results.

ATT-VZ-115 For all large hot cut projects that were completed in the month of August 2003, September 2003, and October 2003 in Massachusetts, please provide for each such project the following:

> (a) The number of projects completed for each month.
>
> (b) The date and time for which the project began.
>
> (c) The date and time for which such project was fully completed.
>
> (d) The number of central office personnel and personnel-hours necessary to complete each such project.

ATT-VZ-116 Please refer to Verizon's Initial Panel Testimony, Exhibit III-A, Tab 7, "Batch HotCut Initial"

> (a) Please explain why CO Frame task #6 "Pull Disconnected Wire On DD+1" appears for both the connect and disconnect.
>
> (b) In the connect section (columns C-F) is the cost produced for this task associated with the UNE-P disconnect?
>
> (c) In the disconnect section (columns G-J) is the cost produced for this task associated with the UNE-L disconnect?

ATT-VZ-117 Please provide the month and year Verizon began developing its WPTS process.

ATT-VZ-118 Please provide a complete copy of all contracts now in effect (or scheduled to take effect in the future) between Verizon and vendors who supply the following items. In particular please provide all price terms, the effective dates of those prices, escalation (or other price adjustment) terms, the life of the contract, re-openers, most favored customer or other renegotiating provisions, volume discount provisions, minimum purchase provisions, performance guarantees, and any other terms that effect the economic value of the contract to Verizon.

> (a) contract basic assignment functions;
>
> (b) contract network installation and maintenance;
>
> (c) contract distributing frame work;
>
> (d) contract processing switching control center work
>
> (e) contract customer service representation; or
>
> (f) contract order testing and distribution support services.

ATT-VZ-119 Please provide Verizon's complete job function code ("JFC") manual which should address, but not be limited to, all the JFCs shown on Exhibit III-C filed with Verizon's Initial Panel Testimony.

ATT-VZ-120 Regarding Exhibit III-C to Verizon's Initial Panel Testimony, please provide union contracts which cover the JFCs shown in this Exhibit and indicate the section/page/line in the contract where one can find the wage schedule for each JFC.

ATT-VZ-121 Regarding Exhibit III-C filed with Verizon's Initial Panel Testimony:

    (a)   Please provide the detailed aggregate direct wages underlying each direct wage per hour figure listed under Column C, and show how these aggregate numbers were derived;

    (b)   Please provide all justification for using these underlying aggregate direct wage numbers in the study;

    (c)   Please break each of these underlying aggregate direct wage numbers into the following component parts:

        (i)   Basic wages and salaries
        (ii)   Overtime wages and salaries
        (iii)   Training Expenses

ATT-VZ-122 Regarding Exhibit III-C filed with Verizon's Initial Panel Testimony:

    (a)   Please provide the detailed supporting information for the hard coded hours underlying each direct wage per hour figure listed under Column C, and show how these hour numbers were derived;

    (b)   Please provide all justification for using these hour numbers in the study;

    (c)   Please break each of these hour numbers down into the component parts:

        (i)   Basic wages and salaries hours
        (ii)   Overtime wages and salaries hours
        (iii)   Training Expenses hours

    (d)   Please provide the corresponding number of paid hours for each asserted amount of productive hours underlying each direct wage per hour figure listed under Column C;

ATT-VZ-123 Regarding Exhibit III-C filed with Verizon's Initial Testimony in this docket:

    (a)   Please provide the detailed supporting information for the hard coded Direct Support numbers underlying each Direct Support figure listed under Column D, showing how these numbers were derived;

    (b)   Please provide all justification for including these hard coded numbers in the study.

    (c)   Please distinguish clerical from support dollars for each of these hard coded numbers.

ATT-VZ-124 Regarding Exhibit III-C filed with Verizon's Initial Panel Testimony:

    (a)   Please provide the aggregate dollar amounts underlying each Direct Support figure listed under Column D, showing how these numbers were derived;

    (b)   Please provide all justification for using these aggregate dollar amounts in the study;

(c)   Please distinguish the clerical from the support dollars for each of these aggregate amounts.

(d)   Please indicate how many levels of supervisory support Verizon includes for each of the JFCs in Exhibit III-C.

(e)   Please define "payroll costs" as used in the component description for direct support.

ATT-VZ-125 Regarding Exhibit III-C filed with Verizon's Initial Panel Testimony:

(a)   Please provide the detailed supporting information for the aggregate dollar amounts underlying Premium figures listed below Column E, and show how these numbers were derived;

(b)   Please distinguish between the aggregate dollar amounts derived from direct and premium wages;

(c)   Please provide all justification for using these aggregate dollar amounts in the study;

(d)   Please define "actual wages paid to occupation work reporting employees" as shown in the description of the component "premium".

ATT-VZ-126 Regarding Exhibit III-C filed with Verizon's Initial Panel Testimony:

(a)   Please provide the detailed supporting information for the aggregate Paid Absence dollar amounts underlying each Paid Absence figure listed under Column F, and show how these numbers were derived;

(b)   Please provide all justification for including these aggregate numbers in the study;

(c)   For each of these underlying aggregate amounts, please distinguish between the dollars for:

          (i)   Holidays
          (ii)   Vacations
          (iii)   Excused Days
          (iv)   Equivalent time off
          (v)   Other paid absence
          (vi)   Off duty accidents
          (vii)   Anticipated disabilities
          (viii)   Other short term absence

ATT-VZ-127 Regarding Exhibit III-C filed with Verizon's Initial Panel Testimony:

(a)   Please indicate what benefit factor was applied to arrive at each Benefits figure listed under Column H and provide all supporting documentation and justification for that factor.

(b)   Please provide separate factors, and supporting information, for:

          (i)   Pension accruals
          (ii)   Insurance

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    (iii)   AD&D
    (iv)   Medical
    (v)   Group Life
    (vi)   Dental
    (vii)   Vision
    (viii)   Medicare
    (ix)   Payments under law
    (x)   Savings Plan
    (xi)   Sickness
    (xii)   Accident
    (xiii)   Other benefit expenses.

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ATT-VZ-128 Regarding Exhibit III-C filed with Verizon's Initial Panel Testimony:

    (a)   Please provide the detailed supporting information for the aggregate dollar amounts underlying each Direct Miscellaneous figure under Column I, showing how these numbers were derived;

    (b)   Please provide all justification for using these aggregate dollar amounts in the study;

    (c)   Please provide a detailed list and description of all costs Verizon included in the component "Direct Miscellaneous"

    (d)   Please define in detail "miscellaneous employee payroll and related expenses which are not chargeable".

ATT-VZ-129 Regarding Exhibit III-C filed with Verizon's Initial Testimony in this docket:

    (a)   Please provide the detailed supporting information for the aggregate dollar amounts underlying each Motor Vehicles figure under Column J and show how these numbers were derived;

    (b)   Please provide all justification for using these aggregate dollar amount in the study;

    (c)   Please explain the process of how these costs are "cleared through the Motor Vehicles Account" starting with the initial capture of the costs in Verizon's accounting system through their final disposition in Verizon's expense accounts;

    (d)   For each aggregate dollar amount identified in paragraph (a), please distinguish between the dollars for:

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    (i)   Overheads
    (ii)   Salaries
    (iii)   Other expenses.

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ATT-VZ-130 Regarding Exhibit III-C filed with Verizon's Initial Panel Testimony:

(a)   Please provide the detailed supporting information for the aggregate dollar amount underlying each Tools figure under Column K, showing how these numbers were derived;

(b)   Please provide all justification for including these aggregate dollar amounts in the study;

(c)   Please explain the process of how these costs are "cleared through the Tools Expense Account" starting with the initial capture of the costs in Verizon's accounting system through their final disposition in Verizon's expense accounts;

(d)   For each aggregate dollar amount referred to in paragraph (a), please distinguish between dollar amounts that are:

      (i)   Overheads
      (ii)   Salaries
      (iii) Other expenses.

ATT-VZ-131 For each year between 2002-2004, please provide the Verizon's pension plan actuarial assumptions (actual gains and expectations). For each year, please compare the pension credits with the pension costs and identify the experienced or anticipated net gain or net loss on Verizon's pension funding.

ATT-VZ-132 If Verizon has purchased or contracted with any other organization to analyze how Verizon's wages, salaries and/or benefits compare to those of other companies, please provide the entirety of those studies as well as any correspondence with the organization.

ATT-VZ-133 Please provide any studies, correspondence or other information possessed by Verizon that compare Verizon's wages, salaries and/or benefits to other companies wages, salaries and/or benefits.

ATT-VZ-134 Please provide all internal documentation, instructions, guidelines, M&Ps, etc. that were reviewed or used by Verizon in formulating and producing its asserted labor rates found in Exhibit III-C.

ATT-VZ-135 After a batch hot cut, please explain in detail, whether, and to what extent, all data transfers are electronically handed off between billing, repair, and provisioning systems?

ATT-VZ-136 Please explain in detail, the processes by which Verizon will perform a hot cut for the following situations:

(a)   Centrex

(b)   Foreign exchange lines

(c)   Line splitting

(d)   Change in Facilities

(e)   Conversion to EEL configuration

ATT-VZ-137 Does the NPAC charge a non-recurring charge ("NRC") per number port? If yes, please answer the following questions:

  (a)   What is it?

  (b)   Under Verizon's proposed Batch process, does Verizon propose that Verizon or the CLEC pay directly to NPAC the amount of the charge?

  (c)   If Verizon proposes that Verizon pay to NPAC the amount of the charge,

  (d)   Is this amount already included in Verizon's proposed charge for its Batch cut process, or is Verizon proposing that such amount should be added to Verizon's proposed charge?

  (e)   Is Verizon aware of whether or not NPAC may terminate AT&T's ability to port numbers for on-net customers due to a hypothetical non-payment of this charge by Verizon?

  (f)   Are there any other charges, beyond the charge identified in response to (a), that NPAC charges to carriers in connection with number ports associated with a hot, cut? If so, what are they?

ATT-VZ-138 With regard to the automated cross-connection devices that Verizon has indicated it has installed in some of its remote central offices, please provide the total length of time it takes these devices to complete a cross connection between a loop and a switch port beginning from when the connection request is made to the device to when the actual connection is complete. This response should assume that all loop and switch ports in the office have been pre-wired to the automated cross connection device.

ATT-VZ-139 Please describe in detail how the request for a connection using automated cross-connection devices is made. Specifically, is this request done manually over a data link by a Verizon technician or is the request generated automatically from Verizon's OSSs?

ATT-VZ-140 Please provide the following information about Verizon's proposal (described on p. 33 of its Initial Panel Testimony) to assume a CLEC's responsibility to notify NPAC for number porting after a batch hot cut:

  (a)   How and when would notification of NPAC occur? Specifically, will the frame technician (or some other Verizon work group) activate the number port immediately after each line is cut over, or will there be a waiting period? If there is a waiting period, what will it be? (E.g., after how many cutovers will activation of number ports occur?)

  (b)   Would Verizon also notify the CLEC that the hot cut and number porting have been completed? If so, please explain in detail how this notification will occur. (E.g., will it occur through the WPTS? If so, how will notifications be input into WPTS? Will frame technicians have real-time access to WPTS? If so, please specify the form of this access (e.g., hand-held wireless devices, WPTS terminals stationed around the frame, or one

technician's calling out the completions to another technician who will perform the WPTS updates.)

(c)   Please describe all the charges that Verizon would assess to CLECs for assuming responsibility for notifying NPAC and, if applicable, for notifying CLECs of completed hot cuts and number porting. Please indicate where in Verizon's cost study Verizon indicates such costs/charges. If Verizon intends to charge for such activity but such costs/charges are not indicated in the cost study, please so state.

ATT-VZ-141 Is Verizon's batch hot cut process intended to be used to process a surge in basic hot cut orders? If not, how does Verizon intended to handle a surge in basic hot cut orders?

ATT-VZ-142 For central offices in which Verizon has already installed automatic distributing frames, what is Verizon's proposed provisioning interval for performing hot cuts?

ATT-VZ-143 Please explain, for the batch hot cut process, at what time of day Verizon plans to schedule hot cuts, and whether (and how) these times may vary from one central office to another. Please also explain how a CLEC is to know the start time for processing of its hot cuts. Does Verizon plan to cut all the lines in that given day based on the start time? Please also explain whether the batch hot cut process is intended to accommodate end-users whose lines must be cut at specified periods of the day.

ATT-VZ-144 For the batch hot cut process, how many days before the date scheduled for a hot cut will Verizon complete the central office wiring? How long before the cut date does Verizon plan to check the quality of the central office wiring?

ATT-VZ-145 For the batch hot cut process, how many days, if any, before the cut date does Verizon plan to perform dial tone checks on lines scheduled for cut-over? How and when does Verizon plan to notify CLECs of no dial tone situations? If no dial tone check is to be performed, please so state.

ATT-VZ-146 Please explain how Verizon processes a UNE-L LSR for a batch hot cut in the following respects:

(a)   Upon receiving the LSR, what cut date does Verizon provide to NPAC?

(b)   How, when and by whom (Verizon or the CLEC) is the LNP transaction initially scheduled with NPAC?

(c)   How will CLECs receive the "notification of the actual cutover date" that is described at p. 33 of Verizon's Initial Panel Testimony? Will CLECs receive an automated notification that is "pushed" to them by WPTS, or will CLECs have to monitor their orders in WPTS to "receive" notification?

ATT-VZ-147 Please provide the following information about batch hot cuts:

(a) Is Verizon considering stratification of the minimum and maximum holding periods described at Initial Panel Testimony p. 32? If so, please provide details about what the revised minimum and maximum holding periods will be by central office type.

(b) If Verizon does not reach the minimum number of lines for performing a batch hot cut in a particular central office within the maximum 35 business day holding period described at Initial Panel Testimony, p. 32, will Verizon nonetheless perform the requested cuts within the 35-day window? If so, will the rate for these cuts be the "batch" hot cut rate?

(c) Is Verizon willing to aggregate orders from different CLECs in order to reach the minimum number of lines for a batch hot cut within the maximum holding period?

(d) What is the basis for the 35-day maximum holding period? If it is based upon the presence of unstaffed central offices that are typically only visited once per month, please specify how many central offices Verizon has in Massachusetts that are only visited once per month.

ATT-VZ-148 Please confirm that if Verizon approves a batch hot cut based on the combined orders of two CLECs and one CLEC does not agree to the project by DD-minus-3, the batch job will proceed for the other CLEC and that the batch hot cut rate will apply.

ATT-VZ-149 Please state the maximum number of lines that a customer can have and still be eligible for inclusion in Verizon's batch hot cut process. Please also explain how, if customers with more than two lines may be included in this process, the process will work for such customers to ensure that all of the customer's lines will be cut in sequence (for example, to avoid interference with such service features as "hunting").

ATT-VZ-150 Please explain in detail why Verizon's batch hot cut process is "not available for UNE-L-to-UNE-L migrations" (p. 36 of Verizon's Initial Panel Testimony).

ATT-VZ-151 Please state how long it takes for Verizon to migrate (1) a CLEC UNE-P customer to Verizon retail and (2) a CLEC UNE-L customer to Verizon retail.

ATT-VZ-152 Please provide the following information about Verizon's indication on p. 34 of its Initial Panel Testimony that "[a]s part of the batch process, a CLEC would have the option of transferring the customer to UNE-P until the line is cut."

(a) Are two separate LSRs required, one for UNE-P transfer and one for a batch hot cut? If so, please explain why these orders cannot be combined on the same LSR. If the orders must be submitted separately, are they to be submitted at the same time or at different times? If the latter, please explain why the orders cannot be submitted at the same time.

(b) Please provide the total of all non-recurring costs, and each component thereof, that would apply to the transfer of a customer to "UNE-P until the

line is cut," and please provide the source information or tariff citations for such charges.

(c)   Please explain fully all further charges for subsequently cutting over this same customer's line in a batch hot cut.   Please indicate which rates, if any, in Exhibit III-A would not apply for cutting over the customer's line in a batch hot cut when the customer is served on UNE-P prior to the batch cut over.

(d)   Please explain fully all charges, including any UNE-P and batch hot cut charges, that would apply from the moment that the customer is acquired by the CLEC in the following situations:

   (i)   The holding period in which the customer stays on UNE-P prior to the line being cut on a batch basis is 10 business days. (If the monthly recurring charges would be allocated, please indicate the basis for such allocation.)

   (ii)   The holding period in which the customer stays on UNE-P prior to the line being cut on a batch basis is 35 business days. (If the monthly recurring charges would be allocated, please indicate the basis for such allocation.)

ATT-VZ-153 Verizon's Initial Panel Testimony, page 34 states: "Once the cut and the number port are complete, Verizon's translations for the retail or UNE-P service previously provided to serve the customer will be removed from the switch." When using the proposed batch hot cut process please describe the process a CLEC will use if it discovers that one (or more) lines associated with the batch job has a customer-affecting trouble on it. Specifically, please describe how the CLEC will report the trouble and how this customer's service will be restored when Verizon is removing the translations from its switch. Please include in your answer how the CLEC will be aware of the period starting when the "lift and lay" task is complete and ending when the translations are removed from the Verizon switch so that the CLEC can request a throwback if it discovers a problem on the line during this period.

ATT-VZ-154 After a CLEC submits an order to convert a current UNE-P (or "UNE-P like") customer to a UNE-L arrangement under the proposed batch hot cut process and before the hot cut occurs, will Verizon Retail have the ability to submit and complete a win-back order? If yes, does Verizon intend to subject such a customer to win-back activities during that period?

ATT-VZ-155 In Exhibit II-A to its Initial Panel Testimony, Verizon provides a Hot Cut Schematic for basic voice service. Can Verizon provide an additional schematic that would show the before and after condition of a hot cut on a shared loop service? If this can be accomplished please provide the additional schematic.

ATT-VZ-156 Separately state, with respect to each of the three hot cut processes (basic, large job, and batch), answers to the following questions:

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(a)   Is there an LSR that will support a hot cut when the existing service is Line Sharing?

(b)   Is there an LSR that will support a hot cut when the existing service is Line Splitting?

(c)   Please provide a web reference to the LSR that supports a hot cut when the existing service is Line Sharing.

(d)   Please provide a web reference to the LSR that supports a hot cut when the existing service is Line Splitting.

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ATT-VZ-157 Verizon, in describing The Basic Hot Cut Process, which is a building block for the "Batch" Hot Cut Process, refers to Exhibit II-C. On Exhibit II-C and on Exhibit II-E used to describe the Proposed Batch Hot Cut Process , under a heading "End user wants move," there is a block that details CLEC interaction with the end user and reference to CSI to determine features and other information to facilitate negotiation with the end user.

<div style="margin-left: 2em;">

(a)   If upon reviewing CSI and discussion with the end user a CLEC learns that the existing Verizon customer has Line Sharing or Line Splitting, and wants voice service from a facilities based voice provider, what "LSR complying with existing Business Rules," should the CLEC utilize to effect this transaction with Verizon?

(b)   Will such a transaction be applicable to the Batch Hot Cut Process?

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ATT-VZ-158 Verizon indicates that the "bulk" process is unnecessary in meeting its obligations should unbundled switching be eliminated as a UNE. Verizon indicates that it offers or will soon offer "a range of effective and efficient options" that will enable Verizon to meet its obligations under FCC Rules.   Verizon indicates one of the efficiencies in place to meet its obligations is WPTS.   In Exhibits II-C, II-D and II-E describing existing and proposed hot cut processes, Verizon references WPTS as a tool to manage the hot cuts and the tool that manages CLEC to Verizon and Verizon to CLEC communications.

<div style="margin-left: 2em;">

(a)   Are Hot Cuts from Line Sharing to Facilities based Line Splitting supported in WPTS?

(b)   Are Hot Cuts from UNE-P Line Splitting to Facilities based Line Splitting supported in WPTS?

(c)   Please provide references describing WPTS support of hot cuts to facility based Line Splitting.

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ATT-VZ-159 Currently hot cuts are processed on a Basic process, with an interval for 1-9 lines of 5 days and within 1 hour. Currently Bulk/projects are processed a negotiated interval, such as 15 days, with a scheduled start time, and real-time notification after every 20 lines are completed. Given the changes reflected in Verizon's proposed batch hot cut process, please respond to the following:

<div style="margin-left: 2em;">

(a)   What value is it to Verizon to avoid the constraints of the one-hour window associated with the current Basic process?

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(b)   Does Verizon believe it is detrimental or advantageous to the CLECs in general to not have a scheduled one-hour window of time for its hot cuts? Please explain the basis for Verizon's belief.

(c)   Does Verizon believe it is detrimental or advantageous to AT&T to not have a scheduled one-hour window of time for its hot cuts? Please explain the basis for Verizon's belief.

(d)   What value is it to Verizon to avoid the constraints of the scheduled start time for bulk/projects?

(e)   Does Verizon believe it is detrimental or advantageous to the CLECs in general to not have a scheduled one-hour window of time for its hot cuts? Please explain the basis for Verizon's belief.

(f)   Does Verizon believe it is detrimental or advantageous to AT&T to not have a scheduled one-hour window of time for its hot cuts? Please explain the basis for Verizon's belief.

(g)   What value is it to Verizon to avoid the constraint of having to notify the CLEC after every say 20 completed cuts? Does Verizon realize any benefit in not having to notify the CLEC on a real time basis if it still has to notify the NPAC administrator on an equally timely basis?

(h)   Does Verizon believe it is detrimental or advantageous to the CLEC in general to not have a scheduled one-hour window of time for its hot cuts? Please explain the basis for Verizon's belief.

(i)   Does Verizon believe it is detrimental or advantageous to AT&T to not have a scheduled one-hour window of time for its hot cuts? Please explain the basis for Verizon's belief.

ATT-VZ-160 Please confirm that Verizon's proposed batch hot cut process does not involve any pre-wiring and that all dial tone checks are performed on the day of the cut.

ATT-VZ-161 Refer to Page 56 of Verizon's Initial Panel Testimony. Please provide any/all data and calculations that were used for determining the travel time in the current study including an explanation describing the typical occurrence and forward-looking adjustment factor that was applied. Please include in your answer all steps required to translate the information from WFA/DI into the analysis and final results.

ATT-VZ-162 Does the WFA-DI system keep track of, and/or permit aggregation of, travel time by employee? Does the employee record "travel time" as an identifiable category?

ATT-VZ-163 Does the WFA-DI system keep track of, and/or permit aggregation of, travel time by employee type? If so what categories of employees (i.e., functional groups) report time for travel to WFA-DI (please provide a complete list of all functional groups who may have reported travel time to the WFA-DI system).

ATT-VZ-164 Please indicate whether any travel time contained in the WFA-DI systems is separately identified by the nature of the work for which the travel is undertaken.

Please indicate how travel time for maintenance and other non-UNE service order work tasks would be accounted for or excluded from your calculations.

ATT-VZ-165 Please indicate if any travel time contained in the WFA-DI systems represents travel for work associated with Verizon retail services. Please also indicate if any adjustments for retail service order processing travel time was excluded from the calculations used in the current study.

ATT-VZ-166 Please provide for the State of Massachusetts the total outside plant facility appearances (i.e., F1) at the MDF (that would be available for assignment, i.e., working or spare) which are located in remote, non-staffed central offices. Please indicate the date as to which this data is relevant.

ATT-VZ-167 For the same date as above, please provide for the State of Massachusetts the total outside plant facility appearances (i.e., F1) at the MDF (that would be available for assignment, i.e., working or spare) which are located in remote central offices where CLECs currently have collocation.

ATT-VZ-168 For the same date as above, please provide for the State of Massachusetts the total outside plant facility appearances (i.e., F1) at the MDF (that would be available for assignment, i.e., working or spare) which are located in manned central offices (i.e., normally staffed).

ATT-VZ-169 For the same date as above, please provide for the State of Massachusetts the total outside plant facility appearances (i.e., F1) at the MDF (that would be available for assignment) which are located in manned central offices (i.e., normally staffed, i.e., working or spare) where CLEC's currently have collocation.

AT&T Communications of New England, Inc.,
By its attorneys,

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